

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

KEVIN VENTURA,

Movant,

v.

UNITED STATES OF AMERICA,
Respondent.

Civil No. 1:20-cv-08064-JGK

Crim. No. 1:09-cr-01015-JGK

Hon. John G. Koeltl

DOCUMENT

ELECTRONICALLY FILED

DOC #:

DATE FILED: 11/16/2020

MOVANT'S MOTION FOR ENLARGEMENT OF TIME
WITHIN WHICH TO FILE MEMORANDUM OF LAW IN SUPPORT
OF MOTION UNDER 28 U.S.C. § 2255 TO VACATE, SET ASIDE,
OR CORRECT SENTENCE BY A PERSON IN FEDERAL CUSTODY

NOW COMES Movant Kevin Ventura "Movant"), acting pro se, and moves this Honorable Court for a thirty- (30) day enlargement of time, up to and including until December 9, 2020, within which to file his memorandum of law in support of his previously-filed Section 2255 motion.

In support of this motion Movant states as follows.

1. USP Canaan, the facility in which Movant is currently incarcerated, is still operating on a modified lock down schedule due to the Covid-19 novel coronavirus, with inmates having much more limited access to the facility's electronic law library than when the prison is under normal operations.

2. Based upon the above, Movant needs additional time to perfect his memorandum of law in support of his Section 2255 motion.

WHEREFORE, Movant prays that this motion will be granted.

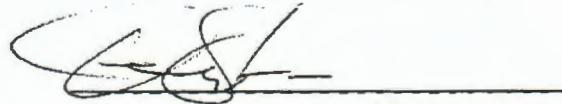
APPLICATION GRANTED
SO ORDERED



John G. Koeltl, U.S.D.J.

Date: 11/05/2020

Respectfully submitted,



Kevin Ventura - #70750-054
USP Canaan - P.O. Box 300
Waymart, Pennsylvania 18472

11/16/20

CERTIFICATE OF SERVICE

It is hereby certified that a true and correct copy of the foregoing was sent, via first-class prepaid mail, this 5th day of November, 2020, to the following counsel for the Government:

Mr. Matthew R. Shahabian
Assistant United States Attorney
Southern District of New York
One St. Andrew's Plaza
New York, NY 10007



Kevin Ventura

Kevin Ventura
Reg. No. 70750-054
U.S. Penitentiary Canaan
P.O. Box 300
Waymart, Pennsylvania 18472

November 5, 2020

Office of the Clerk
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Ventura v. USA, 1:20-cv-8064-JGK (1:09-cr-1015-JGK)

Dear Sir/Madam:

Enclosed for filing in this matter please find the original and one (1) copy of Movant's Motion for Enlargement of Time Within Which to File Memorandum of Law in Support of Motion Under 28 U.S.C. § 2255 to Vacate, Set Aside, or Correct Sentence by a Person in Federal Custody.

Thank you very much for your attention to this matter.

Very truly yours,



Kevin Ventura

Encls.

cc: Matthew Shahabian, AUSA

Kevin Ventura
Reg. No. 70750-054
United States Penitentiary
USP Canaan
P.O. Box 300
Waymart, PA 18472

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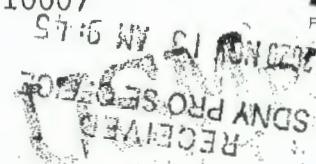
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United States District Court
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500 Pearl Street
New York, New York 10007



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Pro Se *[Handwritten signature]*